

# **Exhibit 102**

**Dallah Avco's Objections to Plaintiffs' Exhibits**

<b>PECs Ex.</b>	<b>Description</b>	<b>Bates No./ Transcript Page</b>	<b>Cited at Averment paragraphs</b>	<b>Dallah Avco Objections</b>
2 F	FBI Operation Encore update	EO14040-000222-MDL	717	403, 602, 802
2 R	FBI interview of [REDACTED], Manufacturers Life	EO14040-001609-MDL	666	402, 403, 602, 802
2 S	FBI interview of [REDACTED], Alliant Int'l Univ.	EO14040-001761-MDL	716	403, 602, 802
2 V	FBI document re: Omar Al Bayoumi trace request	EO14040-002548-MDL	703	402, 403, 602, 802
2 V	FBI document re: Omar Al Bayoumi trace request	EO14040-002563-MDL	631, 703	402, 403, 404, 602, 802
2 AA	FBI document re: Soliman Al Ali	EO14040-003324-MDL	661, 666, 675	402, 403, 602, 802
2 CC	FBI document re: Soliman Al Ali	EO14040-003552-MDL	666	402, 403, 602, 802
5	Expert Report of Bassem Youssef	None	660, 665, 696, 712	402, 403, 602, 702
6	PCA Al Bayoumi secondment extension decree	DA001119	1189	None
9	Joint Inquiry Report into 9/11 Attacks	BUR-PEC-032169	701	403, 602, 802
12 R	Demonstrative re: Bayoumi calls to Ercan and Magdi Hanna	None	653	None
12 V	Demonstrative re: Bayoumi calls to PCA	None	874, 1190	None
12 AA	Al Bayoumi handwritten address book	MPS738	651	None
12 BB	"Omar's Phone Book"	MPS 688	651	None
35	FBI interview of [REDACTED]	FBI007995	700	402, 403, 602, 802
36	Al Bayoumi INS form and letter from Magdi Hanna	None	657, 700, 707, 708	None
37	Al Bayoumi work history	None	717	None
38	Al Bayoumi letter to U.S. International University	Bayoumi Dep. Ex. 683	711	None
66	Al Salmi letter to PCA re: educational leave	KSA0000000901	685, 690	None
78	CIA Report: Funding Islamic Extremist Movements	CIA_000720	663	402, 403, 602, 802
79	CIA Report: Usama bin Ladin	CIA_000807	663	402, 403, 602, 802
83	CIA Report: Islamic Banking	CIA-SUB_0020	663	402, 403, 602, 802
84	Excerpt from Joint Inquiry Report (the "28 pages")	None	701	403, 602, 802
86	Declaration of Samuel Coombs	None	passim	402, 403, 602, 802
87	Al Salmi directive to Avco Overseas	DA002267	629, 631	None
88	PCA purchase requisition	DA002268	629	None
90	Snell Decl. Ex. 2: Al Bayoumi 9/11 Commission interview	None	681	602, 802
91	Declaration of Holly Ratchford	None	698	802
94	Al Angari Deposition Transcript	24:18-27:17	628	None
94	Al Angari Deposition Transcript	30:9-31:13	629	None
94	Al Angari Deposition Transcript	88:20-89:14	674	None
94	Al Angari Deposition Transcript	101:24-103:19	714	None
94	Al Angari Deposition Transcript	104:15-105:20	682	None

**Dallah Avco's Objections to Plaintiffs' Exhibits**

<b>PECs Ex.</b>	<b>Description</b>	<b>Bates No./ Transcript Page</b>	<b>Cited at Averment paragraphs</b>	<b>Dallah Avco Objections</b>
94	Al Angari Deposition Transcript	114:5-124:25	875	None
94	Al Angari Deposition Transcript	145:25-149:10	691	None
94	Al Angari Deposition Transcript	149:21- 150:23	692	None
94	Al Angari Deposition Transcript	153:15-23	692	None
94	Al Angari Deposition Transcript	156:3-23	629	None
94	Al Angari Deposition Transcript	162:20-23	692	None
94	Al Angari Deposition Transcript	163:19-164:2	693	None
94	Al Angari Deposition Transcript	166:21-25	630	None
94	Al Angari Deposition Transcript	196:5-11	630	None
94	Al Angari Deposition Transcript	238:21-240:16	629, 694	None
94	Al Angari Deposition Transcript	245:3-8	674	None
94	Al Angari Deposition Transcript	248:1-21	630	None
94	Al Angari Deposition Transcript	253:4-254:25	630	None
94	Al Angari Deposition Transcript	269:1-270:22	674	None
94	Al Angari Deposition Transcript	319:3-320:19	630	None
94	Al Angari Deposition Transcript	322:11-323:12	630	None
94	Al Angari Deposition Transcript	327:18-329:25	630	None
94	Al Angari Deposition Transcript	387:9-388:1	674	None
103	Ammar Kamel Deposition Transcript	23:19-25:3	702	None
103	Ammar Kamel Deposition Transcript	114:3-14	674	None
103	Ammar Kamel Deposition Transcript	171:17-23	665 n.1, 669, 714, 715	None
103	Ammar Kamel Deposition Transcript	180:10-182:3	680	None
103	Ammar Kamel Deposition Transcript	183:10-23	680	None
103	Ammar Kamel Deposition Transcript	196:13-207:23	665 n.1, 669, 714, 715	None
111	Jaber Khalifa Deposition Transcript	22:16-25:17	662	None
111	Jaber Khalifa Deposition Transcript	30:3-34:14	664	None
111	Jaber Khalifa Deposition Transcript	30:14- 34:21	670	None
111	Jaber Khalifa Deposition Transcript	39:4-20	664	None
111	Jaber Khalifa Deposition Transcript	51:16-52:21	664	None
111	Jaber Khalifa Deposition Transcript	55:11-23	670	None
111	Jaber Khalifa Deposition Transcript	76:3-21	670	602
111	Jaber Khalifa Deposition Transcript	76:23-77:5	670	602
111	Jaber Khalifa Deposition Transcript	89:3-91:23	676	None

**Dallah Avco's Objections to Plaintiffs' Exhibits**

<b>PECs Ex.</b>	<b>Description</b>	<b>Bates No./ Transcript Page</b>	<b>Cited at Averment paragraphs</b>	<b>Dallah Avco Objections</b>
111	Jaber Khalifa Deposition Transcript	90:16-24	670	None
111	Jaber Khalifa Deposition Transcript	98:10-99:20	676	602
120	Al Bayoumi Deposition Transcript	35:4-37:14	628	None
120	Al Bayoumi Deposition Transcript	38:15-43:11	628	None
120	Al Bayoumi Deposition Transcript	73:7-74:13	675, 677	None
120	Al Bayoumi Deposition Transcript	74:14-75:11	675, 677	None
120	Al Bayoumi Deposition Transcript	101:13-102:1	654	None
120	Al Bayoumi Deposition Transcript	102:21-103:7	654	None
120	Al Bayoumi Deposition Transcript	103:15-104:15	654	None
120	Al Bayoumi Deposition Transcript	104:16- 105:3	654	None
120	Al Bayoumi Deposition Transcript	474:21-475:3	681	None
120	Al Bayoumi Deposition Transcript	475:3-476:16	681	None
120	Al Bayoumi Deposition Transcript	772:1-7	721	None
120	Al Bayoumi Deposition Transcript	804:3-15	721	None
122	Riaz Khan Deposition Transcript	51:21-52:6	678	None
122	Riaz Khan Deposition Transcript	152:3-154:9	678	None
122	Riaz Khan Deposition Transcript	163:7-164:1	678	None
125	Samuel Coombs Deposition Transcript	23:7-14	700	None
125	Samuel Coombs Deposition Transcript	36:8-37:25	672	602
125	Samuel Coombs Deposition Transcript	39:21-40:22	672	402, 403, 602
125	Samuel Coombs Deposition Transcript	45:16-22	672	402, 403, 602
125	Samuel Coombs Deposition Transcript	48:6-49:4	675	None
125	Samuel Coombs Deposition Transcript	58:1-24	638	None
125	Samuel Coombs Deposition Transcript	58:25-60:12	700	None
125	Samuel Coombs Deposition Transcript	59:12- 60:12	639	None
125	Samuel Coombs Deposition Transcript	59:12-21	640	None
125	Samuel Coombs Deposition Transcript	59:22-60:12	641	None
125	Samuel Coombs Deposition Transcript	67:24-68:10	672	402, 403
125	Samuel Coombs Deposition Transcript	131:14-20	644	None
125	Samuel Coombs Deposition Transcript	139:17-20	644	None
125	Samuel Coombs Deposition Transcript	143:7-148:21	701	None
125	Samuel Coombs Deposition Transcript	147:13-23	645	None
125	Samuel Coombs Deposition Transcript	148:13-21	646	None

**Dallah Avco's Objections to Plaintiffs' Exhibits**

<b>PECs Ex.</b>	<b>Description</b>	<b>Bates No./ Transcript Page</b>	<b>Cited at Averment paragraphs</b>	<b>Dallah Avco Objections</b>
125	Samuel Coombs Deposition Transcript	155:16-157:9	675, 677	602
125	Samuel Coombs Deposition Transcript	159:17-160:14	672	402, 403
125	Samuel Coombs Deposition Transcript	168:21-169:6	665 n.1	None
125	Samuel Coombs Deposition Transcript	171:11-172:16	657	602
125	Samuel Coombs Deposition Transcript	171:14-21	637	None
125	Samuel Coombs Deposition Transcript	171:22-172:4	650	None
145	Bank Account Pre-Check Report	KSA0000007506	666	402, 403
162	Declaration of Elizabeth Amundson, GWU	None	688	None
180	Alawi Kamel Deposition Exhibit 127	None	665 n.1, 669, 714, 715	None
181	Dallah Avco Al Bayoumi secondment request	KSA0000001029	668	Translation
182	Dallah Avco Al Bayoumi secondment extension request	DA001110	680, 701, 1189	None
195	Al Bayoumi work history	KSA0000000629	627	None
196	Al Bayoumi GWU certificates	KSA0000000734	688	None
197	PCA Al Bayoumi performance review	KSA0000000879	704, 705	None
198	PCA Al Bayoumi performance review	KSA0000000882	704, 705	None
199	PCA memo re: Al Bayoumi educational leave request	KSA0000000888	691	None
200	PCA memo re: Al Bayoumi educational leave request	KSA0000000889	691	None
201	PCA memo re: Al Bayoumi transfer to AED	KSA000001054	628	None
207	PCA memo re: Al Bayoumi extraordinary leave	KSA0000004499	630	None
208	PCA memo re: Al Bayoumi extraordinary leave	KSA0000004500	630	None
209	PCA memo re: Al Bayoumi extraordinary leave	KSA0000004501	630	None
211	Saudi Consulate memo re: Al Bayoumi	KSA0000006642	658, 708, 722	402, 403, 602, 802
215	PCA Al Bayoumi secondment extension decree	KSA0000000705	875	None
228	Al Bayoumi educational leave request	KSA0000000902	684, 694	None
229	Purported GWU acceptance letter	KSA0000000903	686	402, 403
233	Al Salmi memo re: Al Bayoumi return to service	KSA0000000989	683	None
252	PCA Al Bayoumi secondment extension decree	KSA0000000710	714	None
253	Dallah Avco Al Bayoumi secondment extension request	KSA0000001019	714	None
276	PCA memo re: Al Bayoumi educational leave request	KSA0000004337	685	None
277	PCA Al Bayoumi secondment extension decree	KSA0000004345	667	None
278	Ministry letter re: Al Bayoumi secondment extension	KSA0000004346	667	None
279	Ministry letter re: Al Bayoumi secondment extension	KSA0000004350	667	None
280	Ministry letter re: Al Bayoumi secondment extension	KSA0000004353	667	None

**Dallah Avco's Objections to Plaintiffs' Exhibits**

<b>PECs Ex.</b>	<b>Description</b>	<b>Bates No./ Transcript Page</b>	<b>Cited at Averment paragraphs</b>	<b>Dallah Avco Objections</b>
281	PCA inquiry re: reasons for Al Bayoumi secondment	KSA0000004466	715	None
282	PCA memo re: Al Bayoumi secondment extension	KSA0000004468	714	None
283	Al Bayoumi leave request	KSA0000004503	630	None
293	Saudi Embassy telegram	KSA0000007791	675	402, 403
311	Al Bayoumi INS form	MPS720_6	655	None
319	FBI Report re: Connections of PENTTBOMB Subjects	PEC-KSA000441	675, 701	403, 602, 802
320	Al Bayoumi educational records	PEC- KSA1-000001-98	700, 709-712, 720	None
340	Al Bayoumi educational records	None	708, 713, 716, 722	None
421	"Omar's Phone Book"	FBI000345	651, 652	None
424	Al Salmi response re: reasons for Al Bayoumi secondment	DA000044	715	None
425	PCA/ANSS Al Bayoumi Authorization to Hire	DA000082	695	None
426	PCA report re: U.S. Consulate meeting	DA000089	702	802
427	Dalla Avco response re: U.S. Consulate meeting	DA000092	674, 702	None
428	Al Bayoumi Notice of Employment	DA000099	678	None
429	Al Bayoumi ANSS timesheets	DA000328	675, 677	None
430	Al Bayoumi payroll	DA000457	696, 699	None
431	PCA Al Bayoumi educational leave decree	DA000548	693	None
432	Wall Street Journal article	DA001002	1189	403, 602, 802
433	PCA/ANSS Al Bayoumi Authorization to Hire	DA001016	674	None
434	Al Bayoumi Personnel Status Change	DA001054	704	None
435	Dallah Avco letter re: Al Bayoumi secondment non-renewal	DA001101	679, 701, 875	None
436	Dallah Avco letter re: Al Bayoumi secondment non-renewal	DA001102	679, 701, 875	None
437	PCA letter re: Al Bayoumi secondment renewal	DA001104	680, 701	None
438	PCA memo re: Al Bayoumi secondment	DA001126	718	None
439	PCA memo re: Al Bayoumi secondment extension	DA001357	680, 701, 1189	None
440	Al Salmi letter re: Ercan payment	DA010582	648	None
443	Dallah Avco Al Bayoumi secondment extension request	KSA0000004462	715	None
448	Ercan Al Bayoumi secondment request	MPS 727_176	665	None
452	Al Bayoumi visa	KSA0000008001	685, 707	None
469	FBI interview of Alp Karli	FBI000281	667, 717	403, 602, 802
488	S.D. Cal. Al Bayoumi criminal complaint	FBI001370	657, 660, 708	402, 403, 404, 802
504	Al Bayoumi phone records	FBI001539	874	None
523	FBI interview of Magdi Hanna	FBI003891	659	403, 602, 802

**Dallah Avco's Objections to Plaintiffs' Exhibits**

<b>PECs Ex.</b>	<b>Description</b>	<b>Bates No./ Transcript Page</b>	<b>Cited at Averment paragraphs</b>	<b>Dallah Avco Objections</b>
543	FBI interview of [REDACTED], Realty Executives	FBI007968-REV2021	666	402, 403, 602, 802
544	FBI interview of [REDACTED]	FBI007995-REV2021	632, 647, 648, 649	402, 403, 602, 802
567	Calendar and Internet printouts	FBI011777	713	402, 802
678 I	Saudi Embassy letter re: Al Bayoumi reference	MPS 82_19	719	None
678 P	Ahmad Al Hamdan letter to Al Bayoumi	MPS 727_145	665	None
678 Q	Al Bayoumi letter to Ahmad Al Hamdan	MPS 727_178	665	None
678 U	Magdi Hanna letter re: Al Bayoumi recommendation	MPS 732_21	633, 656	None
678 X	Puprorted GWU Law School letter re: Al Bayoumi	MPS 732_307	689	402, 403
678 Y	Al Bayoumi GWU course materials	MPS732_361-368	681	None
678 Z	Saudi Embassy letter re: Al Bayoumi scholarship	MPS 732_449	719	None
678 AA	GWU Al Bayoumi transcript	MPS732_821	681	None
680 A	GWU Al Bayoumi certificates	KSA0000000734 +	681	None
680 B	GWU Al Bayoumi certificates	KSA0000000735 +	681	None
680 C	GWU Al Bayoumi diploma and transcript	KSA0000000906	681	None
N/A	9/11 Commission Report	272	712	403, 602, 802
N/A	9/11 Commission Report	515 n.18	675	403, 802
N/A	Declaration of Robert Graham (Dkt. 2927-2)	N/A	665	403, 602, 702, 802
N/A	Declaration of Alawi Kamel (Dkt. 1712-2)	N/A	670	None